

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

FLEMING STEEL COMPANY,	)	Case No. 11-22292 JKF
	)	
Debtor-in-	)	
Possession,	)	Chapter 11
	)	
FLEMING STEEL COMPANY,	)	Document No.: _____
	)	
Movant,	)	
	)	
vs.	)	
	)	
No Respondent.	)	

**MOTION TO EXTEND EXCLUSIVITY PERIOD FOR DEBTOR TO FILE  
PLAN AND DISCLOSURE STATEMENT**

**AND NOW**, comes Fleming Steel Company (“Debtor-in-Possession”) by and through its counsel, Alan E. Cech, Esquire, and files this Motion to Extend Exclusivity Period for Debtor to file a Plan and Disclosure Statement as follows:

1. This Motion is being brought pursuant to the provisions of 11 U.S.C. §1121 (b) and (d).
2. On April 11, 2010, Fleming Steel Company (“Debtor”) filed a Voluntary Chapter 11 Bankruptcy Petition at the above docket number and since that time has been operating as a Debtor-in-Possession.
3. Pursuant to 11 U.S.C. § 1121, the Debtor has the exclusive right to file a Plan of Reorganization and Disclosure Statement for a period of 120 days from the date of the Order for Relief. This period expires on August 9, 2011.
4. The Debtor has fully complied with all of the provisions of operating as a Debtor-in-Possession and is moving forward with what it hopes will be a successful reorganization.

5. The Debtor is in the process of negotiating for interim financing and possible investment which will support future operations and the funding of a Plan of Reorganization. Therefore, it requests an extension of the exclusivity period for the Debtor to file a Plan of approximately sixty days; until October 10, 2011.

6. The Debtor is fully complying with all Chapter 11 operating guidelines and no creditors will be prejudiced by an extension of the exclusivity period of approximately sixty days; until October 10, 2011.

**WHEREFORE**, Debtor respectfully requests the Court to enter an Order extending the exclusivity period for the Debtor to file a Plan and Disclosure Statement until October 10, 2011.

Date: 7/22/2011

Respectfully submitted,

MORELLA & ASSOCIATES, A  
Professional Corporation

/s/Alan E. Cech  
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